

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
The Petition by The United States)	
Department of Transportation For)	File No. NSD - L - 99 -24
Assignment of An Abbreviated Dialing)	
Code (N-1-1) To Access Intelligent)	
Transportation System (ITS))	
Services Nationwide)	
)	
The Use of N11 Dialing Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	

**SUPPLEMENTAL COMMENTS OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

INTRODUCTION AND BACKGROUND

On March 8, 1999, the United States Department of Transportation (US DOT) filed a petition with the Federal Communications Commission (FCC) for the assignment of a nationwide standard abbreviated dialing number (N-1-1) for use by state and local governments to deliver travel-related information to the general public. On April 20, 1999, the FCC released a public notice that established the pleading cycle for comments responding to the US DOT's petition.

On August 20, 1999, The Public Utilities Commission of Ohio (Ohio Commission or PUCO) filed comments in these proceedings providing the FCC with the deployment

status of 2-1-1 and 5-1-1 in the State of Ohio. At that time, the Ohio Commission informed the FCC that it had established a two-year pilot project under which it had authorized the Ohio Department of Transportation (ODOT) to use, on an intrastate basis, an N-1-1 service code in connection with Advanced Regional Traffic Interactive Management & Information System (ARTIMIS) to manage more effectively traffic patterns through information to the general public. The Ohio Commission's comments, however, neither supported nor opposed the US DOT's petition.

On October 8, 2004, the FCC issued a Public Notice (notice) in the above-captioned proceedings inviting interested parties to update the record concerning the designation of 2-1-1 and 5-1-1 as abbreviated dialing codes and the US DOT's request for a nationwide N-1-1.

Consistent with the notice, the Ohio Commission takes this opportunity to provide the FCC with an update concerning the status of N-1-1 deployment in the State of Ohio. In keeping with our original comments regarding this matter, the Ohio Commission takes no position either supporting or opposing US DOT's request. Comments responding to the FCC's October 8, 2004 notice are due at the FCC on November 12, 2004.

DISCUSSION

2-1-1

On June 21, 2001, the Ohio Commission issued a Finding and Order in Case No. 93-1799-TP-COI (Appendix A) designating the Ohio Council of Information and Referral Providers (OCIRP) as the Commission-sanctioned administrator for 2-1-1 information and referral services in the State of Ohio.¹ In that decision, the Ohio Commission also required the OCIRP to filed reports at six-month intervals that identify all approved 2-1-1 call centers, the date of their application, the approval date, the proposed service area, the serving telephone company, the date the approved application was provided to the serving telephone company, and the date the 2-1-1 service commenced to the call center. The most recent OCIRP report, which was filed on August 31, 2004, reflects that 31 of Ohio's 88 counties have access to 2-1-1 abbreviated dialing to social service and referral agencies.²

Taking into consideration the FCC's mandate regarding 2-1-1 service, the Ohio Commission further required that a standard tariffed 2-1-1 service offering be made available by those service providers over whom the PUCO exercised jurisdiction.

¹ The PUCO's November 21, 2004, Entry on Rehearing in Case No. 93-1799-TP-COI is attached as Appendix B.

² The OCIRP report and the PUCO's decisions in our abbreviated dialing pattern investigation can be accessed at the following URL by entering "93-1799" in the search dialog box: <http://dis.puc.state.oh.us/>

Consequently, all LECs in the State of Ohio were instructed to file proposed 2-1-1 tariffs for PUCO approval. That is, the Ohio Commission determined that OCIRP-approved call centers may make application to the serving telephone company for 2-1-1 access services. The call centers subsequently are to furnish the local service providers with the necessary information to develop a 2-1-1 service offering. The local service provider no later than thirty days after receipt of the first application for 2-1-1 service from an approved call center is required to file a proposed 2-1-1 tariff with the PUCO for approval. The tariff application must also reflect that the date that service can be initiated is no later than 30 days after the effective date of the proposed tariff. Attached as Appendix C is a table listing LEC-approved 2-1-1 services to sanctioned providers. The table reflects that 12 of Ohio's 43 ILECs (including the states four largest carriers) provide 2-1-1 services.

5-1-1

Consistent with the FCC's 2-1-1 decisions, the Ohio Commission's June 21, 2001, Finding and Order began the process of migrating the ODOT's use of 2-1-1 to 5-1-1 for its traffic information service to the general public. In that same decision, the PUCO also granted the ODOT an extension of time to continue its ARTIMIS pilot project.

On July 12, 2004, the Ohio Commission in Case No. 93-1799 issued an entry inviting supplemental comments regarding ODOT's request for a permanent

designation of 5-1-1 to facilitate traveler information statewide in Ohio. In particular, the Ohio Commission invited comments regarding an ODOT petition to be designated as the State of Ohio's 5-1-1 implementation coordinator, because, as ODOT maintains, it possesses the necessary experience with (1) the intelligent transportation system (ITS); (2) in developing plans for a statewide ITS architecture; and (3) constructing, operating, and maintaining transportation infrastructure and resources.

The Ohio Commission also invited comments on an SBC's proposal to establish an optional service entitled "SBC 511," PUCO Case No. 04-601-TP-COI. SBC's application reflects that its proposed service is intended to allow wireline local exchange end users by dialing 5-1-1 to reach a call center designated by the tariffed customer (*i.e.*, the Federal or State governmental transportation agency that purchases the service). The application to establish SBC 5-1-1 also reflects that the service will be furnished to 5-1-1 providers for a nonrecurring charge.

Since SBC's 5-1-1 application raised potentially interrelated issues similar to those raised by ODOT's request for 5-1-1 designation as implementation coordinator, the Ohio Commission merged SBC's 04-601 and the PUCO's 93-1799 proceeding for the explicit purpose of requesting comments from interested persons regarding ODOT's request for designation authority and SBC's proposed 5-1-1 service. Comments were due on June 21, 2004. A copy of the PUCO's Entry is attached Appendix D.

As mentioned earlier, because the PUCO is currently not yet in a position to evaluate the manner in which the public interest has been affected by ODOT's trial use of an N-1-1 service code in connection with its ARTIMIS traffic management project, the PUCO does not wish, at this time, to take any position, either in support of or against, the petition filed with the FCC by the US DOT.

CONCLUSION

The Ohio Commission thanks the FCC for the opportunity to file comments updating the status of 5-1-1 and 2-1-1 implementation in the State of Ohio.

Respectfully submitted,

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